



NORLITE CORPORATION

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February 28, 2012

Mr. William J. Clarke
Regional Permit Administrator
New York State Department of Environmental Conservation
Region 4
1130 North Westcott Road
Schenectady, NY 12306-2014

RETURN RECEIPT REQUESTED VIA EMAIL

Mr. Kenneth Eng
Air Compliance Branch
United States Environmental Protection Agency
Region 2
290 Broadway
New York, NY 10007-1866

RETURN RECEIPT REQUESTED VIA EMAIL

Re: Norlite Corporation-MACT Excessive Exceedance Report
Kiln 1: 02/15/12- 02/27/12
Kiln 2: 02/15/12- 02/27/12

Dear Sirs:

In accordance with 40 CFR 63.1206(c)(3)(vi), the Norlite Corporation (Norlite) is submitting an "Excessive Exceedance Report" for the timeframe of 02/15/12 thru 02/27/12. The attached document explains each of the "malfunctions" for Kiln One and Two.

The results of the investigation concluded a majority of the exceedances were a result of the 1 second time delay cutoff limit of -0.00 inches of water column associated with the negative backend chamber pressure. The investigation revealed mechanical failures on draft inducing equipment and reaching the end of the burn tank to be the main cause of the cutoffs. At no time were fugitive emissions witnessed coming from the kiln. Norlite and its consultant will continue to evaluate each cutoff in order to reduce the overall number of cutoffs.

All of the malfunctions that occurred were consistent with our Startup, Shutdown and Malfunction Plan (SSMP). As approved by the NYSDEC on February 6, 2006, these reports are being sent electronically.

Should you have any questions regarding this letter, please contact me at (518) 235-0401 or email at: tvanvranken@norlitecorp.com.

Sincerely,

Thomas Van Vranken

Thomas Van Vranken
Environmental Manager
Attachments

ecc: Don Spencer, NYDEC – R4 w/attachments
James Lansing, NYSDEC – CO w/attachments
Joe Hadersbeck, NYSDEC – R4w/attachments



NORLITE CORPORATION
MACT EXCEEDANCE REPORT - KILN 1
02/15/12 - 02/27/12

| Start Date | Start Time | End Date | End Time | Downtime | # | Event | Cause | Parameter | Limit | Corrective Action |
|------------|------------|-----------|----------|----------|----|-------------|--|-------------------------------------|-------|---|
| 2/22/2012 | 17:50:53 | 2/22/2012 | 17:59:24 | 0:08:31 | 38 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span Due to the End of the Burn Tank Being Reached / Tank Switch | LGF Flow | Span | Switched Tank/Adjusted Fuel Flow |
| 2/25/2012 | 23:50:52 | 2/25/2012 | 23:57:44 | 0:06:52 | 39 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for Stack Gas Span | Stack Gas Flow Rate | Span | Adjusted Fuel Flow |
| 2/26/2012 | 16:52:29 | 2/26/2012 | 17:09:44 | 0:17:15 | 40 | Malfunction | Strong Wind Gusts Coupled With A Large Piece of Clinker In the Hood of the Kiln Caused A Sudden Loss of Negative Pressure at the Front of the Kiln | Front Kiln Pressure, 1 Second Delay | Opl | Removed Clinker and Re-Adjusted Kiln System Draft |



NORLITE CORPORATION
MACT EXCEEDNACE REPORT - KILN 2
02/15/12 - 02/27/12

| Start Date | Start Time | End Date | End Time | Downtime | # | Event | Cause | Parameter | Limit | Corrective Action |
|------------|------------|-----------|----------|----------|----|-------------|--|---------------------------------------|-------|---|
| 2/15/2012 | 8:35:27 | 2/15/2012 | 8:35:53 | 0:00:26 | 88 | Malfunction | The Drive System on the Front Barron Fan Tripped Out Which Caused A Momentary Loss of Draft In the Kiln System/No Fugitive Emissions Were Witnessed | Back Chamber Pressure, 1 Second Delay | Opl | Adjusted Kiln System Draft |
| 2/16/2012 | 4:45:37 | 2/16/2012 | 4:46:03 | 0:00:26 | 89 | Malfunction | The Drive System on the Front Barron Fan Tripped Out Which Caused A Momentary Loss of Draft In the Kiln System/No Fugitive Emissions Were Witnessed | Back Chamber Pressure, 1 Second Delay | Opl | Adjusted Kiln System Draft |
| 2/16/2012 | 4:46:08 | 2/16/2012 | 4:46:37 | 0:00:29 | 90 | Malfunction | The Drive System on the Front Barron Fan Tripped Out Which Caused A Momentary Loss of Draft In the Kiln System/No Fugitive Emissions Were Witnessed | Back Chamber Pressure, 1 Second Delay | Opl | Adjusted Kiln System Draft |
| 2/17/2012 | 3:39:20 | 2/17/2012 | 4:42:29 | 1:03:09 | 91 | Malfunction | The Atomization Air Compressor Stopped Which Caused a Loss of Draft In the Kiln System/No Fugitive Emissions Were Witnessed/The Loss of Air Also Caused the CO's to Spike | Back Chamber Pressure, 1 Second Delay | Opl | Re-Started the Air Compressor and Adjusted the Draft in the Kiln System |
| 2/18/2012 | 4:49:36 | 2/18/2012 | 4:50:14 | 0:00:38 | 92 | Malfunction | End of the Burn Tank Reached Which Caused A Loss of Flame Which Caused a Pressure Pulse Throughout The Kiln System/No Fugitive Emissions Were Witnessed | Back Chamber Pressure, 1 Second Delay | Opl | Switced Tanks and Started Fuel Flow |
| 2/18/2012 | 5:26:47 | 2/18/2012 | 5:27:10 | 0:00:23 | 93 | Malfunction | While Controlling LGF Line Pressure with Valves, a Fuel Flow Surge was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed | Back Chamber Pressure, 1 Second Delay | Opl | Adjusted LGF Pump Pressure to Allow Finer Adjustments at the Kilns |
| 2/18/2012 | 20:35:11 | 2/18/2012 | 20:36:23 | 0:01:12 | 94 | Malfunction | Instantaneous Upper Instrument Setpoint Reached for LGF Flow Span | LGF Flow | Span | Adjusted Fuel Flow |
| 2/22/2012 | 17:47:40 | 2/22/2012 | 17:49:55 | 0:02:15 | 95 | Malfunction | Flame Started Pulsing Due to the End of the Burn Tank Being Reached, Pulsing Flame Cuased Pressure Pulses Throughout the Kiln System/No Fugitive Emissions Were Witnessed | Back Chamber Pressure, 1 Second Delay | Opl | Switced Tanks and Started Fuel Flow |
| 2/22/2012 | 17:47:40 | 2/22/2012 | 17:48:08 | 0:00:28 | 96 | Malfunction | Flame Started Pulsing Due to the End of the Burn Tank Being Reached, Pulsing Flame Cuased Pressure Pulses Throughout the Kiln System/No Fugitive Emissions Were Witnessed | Back Chamber Pressure, 1 Second Delay | Opl | Switced Tanks and Started Fuel Flow |
| 2/22/2012 | 17:48:14 | 2/22/2012 | 17:48:55 | 0:00:41 | 97 | Malfunction | Flame Started Pulsing Due to the End of the Burn Tank Being Reached, Pulsing Flame Cuased Pressure Pulses Throughout the Kiln System/No Fugitive Emissions Were Witnessed | Back Chamber Pressure, 1 Second Delay | Opl | Switced Tanks and Started Fuel Flow |
| 2/23/2012 | 23:02:20 | 2/23/2012 | 23:02:56 | 0:00:36 | 98 | Malfunction | While Controlling LGF Line Pressure with Valves, a Fuel Flow Surge was Experienced which caused a Pressure Pulse in the Kiln System / No Fugitive Emissions were Witnessed | Back Chamber Pressure, 1 Second Delay | Opl | Adjusted LGF Pump Pressure to Allow Finer Adjustments at the Kilns |

| | | | | | | | | | | |
|-----------|---------|-----------|----------|----------|-----|-------------|---|---------------------|------|---|
| 2/25/2012 | 6:44:46 | 2/25/2012 | 6:53:14 | 0:08:28 | 99 | Malfunction | Strong Wind Gusts Out of the West Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas | Stack Gas Flow Rate | Span | Adjusted Fuel Flow |
| 2/25/2012 | 7:25:43 | 2/25/2012 | 7:52:21 | 0:26:38 | 100 | Malfunction | Strong Wind Gusts Out of the West Caused the Instantaneous Upper Instrument Setpoint to be Reached for Stack Gas | Stack Gas Flow Rate | Span | Adjusted Fuel Flow |
| 2/25/2012 | 7:58:44 | 2/26/2012 | 16:00:00 | 32:01:15 | 101 | Malfunction | The Stack Gas Instrument Faulted/I&E Troubleshot the Unit to Determine the Cause of the Fault. Ultimately the Unit Was Replaced | Stack Gas Flow Rate | Span | I&E Investigated the Cause of the Fault/Instrument Was Replaced |